

Exhibit A

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

Case No: 19-cv-08655 (JHR)

-----x

October 2, 2023

9:12 a.m.

Videotaped Deposition of NonParty
Witness PATRICIA FLORISSI, pursuant to Notice,
before CINDY A. AFANADOR, Certified Shorthand
Reporter, Registered Professional Reporter,
Certified Realtime Reporter, Registered Merit
Reporter, NYSRCR, NYSACR and Notary Public of
the State of New York.

**THIS TRANSCRIPT CONTAINS CONFIDENTIAL
PORTIONS DESIGNATED BY COUNSEL**

1 Patricia Florissi

2 MR. GAGE: We don't have any
3 tabs, just for the record.

4 MS. GREENE: We're going to give
5 you a copy of the document.

6 MR. GAGE: So we're going to go
7 with an exhibit number instead of a tab
8 number?

9 MS. GREENE: Well, we're going to
10 mark it as an exhibit as I think I just
11 mentioned. Let's hold off on yours, and
12 if you could mark this as Florissi
13 Exhibit 1.

14 (Florissi Exhibit 1, Evaluation,
15 marked for identification.)

16 Q. Ms. Florissi, do you recognize
17 this document?

18 A. Yes, I do.

19 Q. And what is this?

20 A. This is my evaluation of Ulku's
21 performance. This is the basis for giving a
22 rating.

23 Q. And can you date this document,
24 approximately?

25 A. Maybe January.

1 Patricia Florissi

2 Q. Of this year?

3 A. Of 2023. I'll have to go back
4 and look at the dates, but Google has specific
5 timelines for giving rating, so I may be
6 wrong, maybe February.

7 Q. Now for delivery where it says
8 they fully delivered on their expectations,
9 did you write that?

10 A. No, it's -- the system gives you
11 the option to say fully delivered or partially
12 delivered or something along those lines.

13 Q. And so you selected they fully
14 delivered on their expectations; is that
15 correct?

16 A. Correct.

17 Q. And those four bullet points
18 underneath, are those bullets that you wrote?

19 A. Yes, they are bullets that I
20 wrote.

21 Q. So this is all information that
22 you are aware of with respect to the work that
23 Ms. Rowe was doing, correct?

24 A. Correct.

25 Q. Under team work attributes, did

1 Patricia Florissi

2 you select they worked effectively with
3 others?

4 A. Yes.

5 Q. And did you add those two bullet
6 points there?

7 A. Yes, I did.

8 Q. And you provided Ms. Rowe with a
9 rating of significant impact; is that correct?

10 A. Yes, I did.

11 Q. And so a significant impact is
12 not one of the performance outliers that you
13 described before, 1 out of 5, correct?

14 A. It is not.

15 Q. What was your rating for this
16 time period?

17 A. Same, significant impact.

18 Q. And is there anything in this
19 document that reflects any negative criticisms
20 of Ms. Rowe?

21 A. In the -- in this document we
22 don't particularly talk about areas of
23 improvement or negative, we talk about what
24 led us to get to a significant impact.

25 Q. So at what point did you decide